

Forward Planning
Northumberland National Park Authority
Eastburn
South Park
Hexham
NE46 1BS

SENT BY EMAIL
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11/07/2019

Dear Sir / Madam,

**NORTHUMBERLAND NATIONAL PARK AUTHORITY LOCAL PLAN:
PUBLICATION DRAFT PLAN**

Thank you for consulting with the Home Builders Federation on the Northumberland National Park Authority Local Plan Publication Draft Plan.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following comments in order to assist Northumberland National Park Authority (NNPA) in the preparation of the emerging local plan. The HBF is keen to ensure that the NNPA produces a sound local plan which provides for the housing needs of the area.

Vision, Strategic Priorities and Spatial Objectives

The HBF are supportive of Strategic Priority 4 which looks to *'support the provision of a range of housing that encourages more working age people and families to live in the National Park or one of its gateway settlements'*.

The HBF are also generally supportive of Spatial Objective 5 which looks *'to make the National Park (and its gateway settlements) a more attractive option for young adults and people of working age to live and work in'*.

The HBF consider that it is important that the Vision, Strategic Priorities and Spatial Objectives are aligned to ensure that the full housing needs of the current and future residents are met.

Policy ST4: Spatial Strategy

The HBF does not consider that Policy ST4 is sound, as it is not justified or consistent with national policy for the following reasons:

Paragraph 4.41 highlights that the population of the park is ageing, with a continuing, strong, increase in the proportion of the resident population over 65 years of age. Whilst this is, perhaps, not surprising it does indicate potential difficulties in maintaining economic and social wellbeing with a stagnant population size but ageing demographic. This will inevitably reduce the potential workforce and population vitality in the future. The HBF therefore consider that the NNPA should seek to address this loss of working age population over the period of the plan, including through the provision of an appropriate range and number of homes.

Paragraph 4.45 states that the Objectively Assessed Housing Need (OAHN) for Northumberland National Park is for up to approximately 160 units over the plan period (2017 – 2037) with approximately 40 of these being affordable. Paragraph 4.47 goes on to state that this plan will not allocate housing sites nor will it contain a housing delivery target. In terms of the scale of housing provision the HBF is mindful of the status of the area as a National Park and therefore does not consider unrestricted housing growth should occur. It is, however, important that the National Park retains its vitality and places due weight upon its duty to; 'seek to foster the economic and social wellbeing of local communities'. Therefore, the HBF would recommend the removal of the words 'up to' in paragraph 4.45 in relation to the 160 dwellings identified as the OAHN. The NNPA will need to ensure that the housing provision does not limit the aspirations of local people or limit the potential for new younger residents to provide or take up economic opportunities within the National Park, particularly in relation to appropriately sized family homes.

Policy ST4 provides a settlement hierarchy and states that '*development should support the service function of Local Centre and the sustainability of Smaller Village by providing additional small scale housing (principal residence or affordable) . . . that would be proportionate to the size of each settlement*'. Paragraph 4.53 defines 'principal residence housing' as a form of market housing controlled by a mechanism which ensures it can be lived in by anyone but only as their principal residence. The HBF seek assurances from the Council that the need for dwellings to be either a principal residence or affordable housing will not be an impediment to the effective delivery of homes. The HBF have concerns in relation to these restrictions and the potential implications they could have on the delivery of homes, including the potential to deliver infrastructure and other policy requirements set out in the plan. The HBF also have concerns in relation to the principal residence requirements and the impacts this could have on future financing and the rights of occupants.

Policy ST5: New Housing

The HBF does not consider that Policy ST5 is sound, as it is not justified or consistent with national policy for the following reasons:

Parts 1 and 2 of this policy require development to provide a mix of dwellings in terms of size, type and tenure and states that this will be assessed against information in the most recent SHMA. The HBF understands the need for a mix of

dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery is appropriate, for example any SHMA will provide a snapshot in time and may be superseded by more up to date alternate sources of information. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand may vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

Policy DM3: Affordable Housing

The HBF does not consider that Policy DM3 is sound, as it is not justified or consistent with national policy for the following reasons:

This policy requires developments of more than 5 dwellings within a Local Centre to provide 50% affordable dwellings. However, the Residential Appraisals from the Viability Assessment Report, do indicate that there are viability issues for some of the site typologies when the 50% policy is applied, for example Scheme O (7 units, brownfield), Scheme P (10 units, brownfield), Scheme W (7 units, brownfield site) and Scheme X (10 units, brownfield site).

The HBF also note that the Viability Assessment assumes a profit of 6% on market dwellings, this does not appear to be in conformity with PPG which states that *'for the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies'* (PPG ID: 10-018).

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. The HBF would also like to participate at the oral Examination if invited to do so. Please use the contact details provided below for future correspondence.

Yours sincerely,



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